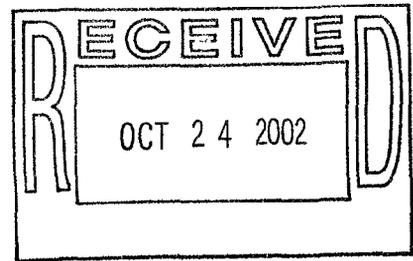


USDA Forest Service
Attn: NFS-EMC Staff (B. Timberlake)
Stop Code 1104
1400 Independence Ave, SW
Washington, DC 20250-1104



Ross Mullins
PO Box 436
118 W. Davis Ave.
Cordova, AK 99574

October 20, 2002

Dear Regional Forester Dennis Bschor and the USDA Forest Service,

As a Cordova resident of 39 years, I am submitting this administrative appeal to the Chugach National Forest Land and Management Plan. I was involved in the planning process during the past four years.

1. Flawed process for wild rivers determination in the Cordova District.

The Copper River Delta and Prince William Sound have some of the nation's most outstandingly remarkable wild fish, cultural, geological, and ecological habitats. I was amazed to learn that of the 780 rivers, streams and lakes that were inventoried by the Chugach planning team, only 9 river "segments" from the Cordova District were determined to be "eligible" as wild. Of these, *none* were recommended to Congress to be included in the national wild and scenic rivers system in the final record of decision.

During the plan revision I was among many Cordova residents who specifically asked the Forest Service to manage the *BERING, MARTIN, COPPER, and KATALLA* at their highest eligibility, as the wild rivers that they are. These rivers all have outstandingly remarkable values, particularly for fish and wildlife, culture (subsistence), and the Forest Service failed to recommend these rivers.

I appeal the final decision that the new 501(b)-1 and 501(b)-2 management will "likely" protect these eligible rivers in the eastern Delta. (Record of Decision, Appendix A) The pristine rivers and wild fisheries of the Copper River Delta are threatened by: oil and gas exploration and development; coal through the private subsurface rights; road-building by Native Corporations, oil companies and DADCO (Katalla route and Martin River corridor), and the potential Copper River Highway; and industrial-scale tourism through the Whittier road and the potential for the deep water port at Shepherd Point in Cordova. The public's eligible wild rivers and streams require better interim protection.

Furthermore, Gravina, Eyak River Watershed, Scott rivers (among many others in our district) all failed to be adequately inventoried for eligibility, and it concerns me that they may not receive interim management required to protect their essential fish habitat and other values over the next 15-20 years of the plan.

2. "Cordova residents" assumption invalid

"There was considerable opposition to congressional designations in Cordova because residents felt that future options for management of fish and wildlife habitat may be curtailed with such a designation."

I believe it is important that the administrative appeal record show that the Record of Decision was incorrect in its rationale that "Cordova residents" did not support congressional designations. In fact, many residents wrote comments and designed alternatives that included wild rivers, wilderness and 501(b)- wilderness areas.

I feel that my comments and participation went largely ignored in favor of commercial interests such as developers of Chugach Alaska Corporation and certain ultra-conservative political leaders of the Cordova District Fishermen United.

While it is correct that a Cordova District Fishermen United board resolution was passed to oppose congressional designations, a very large number of fishermen members of CDFU disagreed with this decision and were turned down on their requests to take the issue to a vote of the members (as is usually common for controversial issues).

3. Eastern Delta and Montague Island management

Locally, I joined many discussions and decided that the best management for the eastern Delta was the 501(b)-wilderness, as it was tailored for local (commercial, subsistence and sport), customary and traditional uses.

Like most Cordovans, I believe this area must be managed to retain its wild and natural character. That is why I am concerned with the management intent of the new 501(b)-1 management. "Reasonable access, including roads, for conducting mineral operations" and a mining plan including allowable "aircraft access" was not what we in Cordova agreed to for the conservation of fish and wildlife habitat. I believe that minerals activities—such as oil and gas development and exploration – is not consistent with the fish and wildlife conservation "theme" of the revised 501(b)-1 management.

I am also concerned that the "Fish and Wildlife Conservation" management of Montague Island is not protective enough for this eligible wilderness area and the "biological heart" of Prince William Sound. The Forest Service should adopt a more protective prescription for this special area.

Thank you for the on-going opportunity to participate in the management of our public lands and rivers.



C. Ross Mullins

cc: Regional Forester Dennis Bschor
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